

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

TOWANDA R. FUTRELL,

Plaintiffs,

v.

CIVIL ACTION NO.: 4:23-cv-00118

DANIEL L. CRAMER, *et al.*

Defendants.

**PLAINTIFF'S OPPOSITION TO
DEFENDANT AV LEASING LLC'S MOTION TO COMPEL**

Comes Now, Plaintiff, TOWANDA FUTRELL by her attorney Christopher M. FitzPatrick, Esq. from Morgan & Morgan, DC, PLLC and states as follows:

1. This very short response is in opposition to Defendant, AV Leasing, LLC's motion to compel.
2. Plaintiff has previously responded to Defendant AV Leasing, LLC's Interrogatories and Request for Production of Documents.
3. Plaintiff, Towanda Futrell is working very closely with Plaintiff's counsel to produce all supplemental information that Defendant is requesting.
4. However, many of the documents that Defendant is requesting were stored electronically and Plaintiff is attempting to recover the documents including but not limited to business documents regarding her Party Bus Business. Plaintiff's counsel's office has been working diligently with Plaintiff to ensure all documents and information that can be obtained are produced in discovery and all answers to Defendant's Request for Production of Documents and Interrogatories are supplemented.

5. Due to the tragic nature of this incident in which three (3) very close individuals close to Ms. Futrell were killed and Plaintiff having difficulty obtaining relevant documents and information, Plaintiff is requesting an additional time to respond.

Towanda Futrell

By Counsel:

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the following was forwarded by electronic email on this 30th day of May 2024 to:

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